IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs in the cases listed on the attached Exhibit A and Defendant Boston Scientific Corporation advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Defendants jointly move the court to dismiss with prejudice, parties to bear their own costs, and terminate from the docket of the court the actions listed on the attached Exhibit A.

To the extent other Defendants remain in the causes of action on Exhibit A, plaintiff will continue to pursue those claims.

Respectfully:

/s/ Clayton A. Clark Clayton A. Clark CLARK, LOVE & HUTSON 440 Louisiana Street Suite 1600 Houston, TX 77002 713.757.1400 (phone) 713.759.1217

Attorney for Plaintiffs on Exhibit A

## SHOOK, HARDY & BACON

/s/ Jon Strongman
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Attorneys for Boston Scientific Corp

Dated: April 24, 2018

## EXHIBIT A – CLARK, LOVE & HUTSON, G.P.

CIVIL ACTION NUMBER (listed numerically in ascending order)	PLAINTIFF NAME
2:13-cv-33550	Susan Hires
2:14-cv-06645	Lorraine Collard
2:14-cv-06650	Traci Cooper
2:14-cv-29294	Lois A. Chavis
2:15-cv-03780	Michelle Clark
2:15-cv-04890	Carolyn Boddie
2:15-cv-09190	Alberta Bruno
2:15-cv-11564	Margaret Blaile

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of April, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Clayton A. Clark Clayton A. Clark